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From: ksrc@rainbowtel.net
Sent: Monday, October 04, 2004 2:26 PM
To: FarmBillRules
Subject: Attn: Conservation Security Program
Attachments: ATTACHMENT.TXT

October 4, 2004

From: Kansas Rural Center
Box 133
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To:
Financial Assistance Programs Division
Natural Resource Conservation Service
P.O. Box 2890
Washington, D.C. 20013-2890

re: Conservation Security Program

Dear Sir or Ms:

We are writing to express the Kansas Rural Center's concerns about the Interim Final Rules of the Conservation Security Program (CSP). First, we want to commend you on launching the program in June and on the successful completion of the first sign-up period. This is an important program at a critical time in American farm policy-- a time when the world stage is finding more problems with the U.S. farm commodity programs but is more accepting of conservation and environmental programs. CSP gives our conservation minded farmers the rewards they deserve and provides others the incentives they need to make improvements and changes that protect our soil and water resources.

Kansas was lucky to be part of the first sign-up with two watersheds included. However, we are concerned about the watershed by watershed selection process. Although we understand that there are logistical and administrative issues in a nationwide program with a continuous sign-up, we think this process would be fairer for farmers and ranchers .

For example, the watershed approach without adequate forewarning, limits eligibility and restricts those farmers found ineligible from any program opportunity until the next time their watershed comes up for consideration, theoretically eight years from when ever the first sign-up was held. In doing the self-assessment workbook, many diversified crop and livestock farmers we talked to lacked certain records or information. For instance, they may be good stewards but were found ineligible for a simple lack of soil tests. Farmers employing no-till practices often utilize commercial fertilizer and chemical applicators who keep the records on soil testing and application for them; thus these farmers were often eligible in this first sign-up giving them an advantage over other good stewards who may be using resource conserving crop rotations and cover crops, or organic practices. Our point is not that the record requirements are wrong, but that with better outreach and education on CSP in a nationwide program with a continuous sign-up, these farmers could better prepare themselves for the program and be eligible in far less than every 8 years of the current set up.

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Furthermore, we are concerned about the ³per acre² cap on contract payments. We believe this cap favors farms with large acreages over smaller farms, The caps may mean there will not be enough incentive for smaller farms to participate, even though smaller farms account for a large number of landowners and operators and total acres. So if we are hoping to ³motivate the rest², the cap may not result in the kind of land enrollment we would like to see.

We would also like to see the cost-share rates for new practices increased, and that enhancement payments include options like extended or resource conserving crop rotations, rotational grazing systems, and buffers, all practices that Kansas Rural Center constituents are very interested in.

In summary, the CSP holds great promise for American farmers and ranchers, and for American taxpayers who will finally see a direct link between benefits like clean air, water and a sustainable resource base, and how their tax dollar is used for farm policy. But the opportunities of the program must reach more farmers and ranchers than the current watershed by watershed system allows. Thank you for the opportunity to comment.

Sincerely,

Mary Fund
Communications Director
Kansas Rural Center
Box 133 Whiting, Ks. 66552